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March 31, 2022

VIA EMAIL AND ECF

Hon. Naomi Reice Buchwald
United States District Judge
Patrick M. Moynihan Courthouse
500 Pearl Street
New York, New York 10007

**Re: *United States v. Ocasio Gonzalez and Rios*, 21 Cr. 610 (NRB)
Request for Postponement of Status Conference**

Dear Judge Buchwald:

I write on behalf of my client, Frank Rios, to request an adjournment of the status conference to the week of May 16, 2022, or any other date thereafter that is convenient to the Court.

The reason for the request is that for the months of February and March I prepared for and tried a document-heavy wire fraud and money laundering case with thousands of pages of bank records and wire transfers, the verdict of which just came in yesterday, March 30. While the government in the instant case provided discovery in mid-January, and more recently additional discovery in March, I have been unable to thoroughly review the productions and go over them with my client. Thus, I cannot at this time determine and apprise the Court if any disposition is possible.

I have spoken to co-counsel for Mr. Ocasio Gonzales, and to AUSA Samuel Dobro for the government, about this matter. Both defense counsel will consent to the exclusion of Speedy Trial time. The government consents to the adjournment.

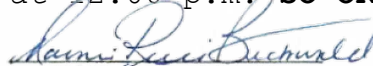
Thank you for your patience and understanding in this matter.

Sincerely,


Camille M. Abate

cc: AUSA Sam Dobro, Esq.
Gregory Morvillo, Esq.

Application granted. The status conference is adjourned until May 18, 2022 at 12:00 p.m. **SO ORDERED.**


NAOMI REICE BUCHWALD
UNITED STATES DISTRICT JUDGE

Dated: New York, New York
April 1, 2022